

MARYLAND Department of Health

Larry Hogan, Governor • Boyd Rutherford, Lt. Governor • Robert R. Neall, Secretary

MARYLAND BOARD OF PHARMACY

4201 Patterson Avenue, Baltimore, Maryland 21215-2299 Kevin M. Morgan, Board President • Deena Speights-Napata, Executive Director

VIA REGULAR & CERTIFIED MAIL RETURN RECEIPT REQUESTED ARTICLE #7001 2510 0002 2070 0494

October 16, 2018

CVS Pharmacy #4079 5603 Baltimore National Pike Catonsville, MD 21228 Attn: Christopher Avon, R.Ph.

Re:

Permit No. P05477

Case No. 18-076

Notice of Deficiencies, Recommended Civil Monetary Penalty, and

Opportunity for Hearing

Dear Pharmacist Avon:

On October 25, 2017, the Maryland Board of Pharmacy (the "Board") conducted an annual inspection of CVS Pharmacy #4079 (the "Pharmacy") for compliance with statutes and regulations governing the operation of a pharmacy. The Board's inspection indicated that the Pharmacy was not compliant with laws relating to pharmacy technician registration. Specifically, the Board inspector observed a pharmacy technician performing delegated pharmacy acts on a registration that expired on July 31, 2017. The Board's records indicate that the pharmacy technician reinstated her registration on October 27, 2017.

I. FINDINGS AND CONCLUSION

The Board adopts as findings the above deficiencies as stated in the Board's inspection report, dated October 25, 2017, and attached hereto as Exhibit A.

Based upon deficiencies at your Pharmacy, the Board finds that the Pharmacy is in violation of the Maryland Pharmacy Act and the regulations adopted thereunder. Specifically, the Board finds the Pharmacy in violation of Health Occ. Art. §§ 12-403(c)(1) and 12-6B-01.

II. RECOMMENDED CIVIL MONETARY PENALTY

Under Maryland Health Occupations Article § 12-410 and COMAR 10.34.11, the Board of Pharmacy has the authority to impose a civil monetary penalty based upon violations of the Maryland Pharmacy Act.

Based upon the deficiencies cited at the Pharmacy, the Board hereby recommends the imposition of a civil monetary penalty of \$1,000.00. The deficiencies upon which the civil monetary penalty is based are set forth above in this Notice and in the Inspection Report dated October 25, 2017.

In determining the recommended civil monetary penalty, the Board took into consideration the aggregating and mitigating factors outlined in COMAR 10.34.11.08.

III. FOLLOW-UP INSPECTION

Please be advised that the Board of Pharmacy may perform a follow-up inspection of the Pharmacy to ensure that the deficiencies noted herein have been addressed and corrected. Should the follow-up inspection indicate that the Pharmacy has further deficiencies, the Board may pursue further disciplinary action against the Pharmacy that may result in the imposition of sanctions such as suspension, revocation or additional monetary penalties.

IV. OPPORTUNITY FOR HEARING

If the Pharmacy disputes the findings, conclusions or the civil monetary penalty, the Pharmacy may request an evidentiary hearing on the Board's decision in this matter. In the event that the Pharmacy requests an evidentiary hearing, the Board shall initiate formal proceedings which will include the opportunity for a full evidentiary hearing. The hearing will be held in accordance with the Administrative Procedure Act, Md. Code Ann. State Gov't § 10-201 et seq., and COMAR 10.34.01. Any request for a hearing must be submitted in writing to Lisa Sanderoff, R.Ph., Investigator Supervisor, Maryland Board of Pharmacy, 4201 Patterson Ave., 5th Floor, Baltimore, Maryland 21215, **no later than thirty (30) days** of the date of this Notice.

Please be advised that at the hearing the Pharmacy would have the following rights: to be represented by counsel, to subpoena witnesses, to call witnesses on its own behalf, to present evidence, to cross-examine witnesses, to testify, and to present summation and argument. Should the Board find the Pharmacy in violation of the deficiencies cited in the Report, the Board may suspend or revoke the pharmacy permit, or impose civil penalties, or both. If the Pharmacy requests a hearing but fails to appear, the Board may nevertheless hear and determine the matter in its absence.

V. OPTION TO PAY RECOMMENDED CIVIL MONETARY PENALTY

Alternatively, the Pharmacy may pay the recommended civil monetary penalty within thirty (30) days of the date of this Notice, in the form of a certified check or money order made payable to the Maryland Board of Pharmacy.

Please mail the check of money order to:

Wells Fargo Bank Attn: State of MD - Board of Pharmacy Lockbox 2051 7175 Columbia Gateway Drive Columbia, MD 21046

NOTE: Please include the case number, 18-076, on your check or money order to insure proper assignment to your case.

Upon the Pharmacy's payment of the civil monetary penalty, this Notice will constitute the Board's final action with respect to the October 25, 2017 inspection, and shall be a public document and order under the Maryland Public Information Act, Md. Code Ann., General Provisions Art. § 4-101, et seq., and reportable in accordance with State and federal laws.

If you have any questions concerning the instructions contained in this letter, please contact Lisa Sanderoff, R.Ph., Investigator Supervisor, at 410/764-3768.

Sincerely,

Deena Speights-Napata Executive Director

cc: Linda Bethman, AAG, Board Counsel John Long, CVS/Caremark Corporation

Attachment



MARYLAND Department of Health Larry J. Hogan, Governor - Boyd K. Rutherford, Lt. Governor - Dennis R. Schrader, Secretary **Exhibit**

MARYLAND BOARD OF PHARMACY
4201 Patterson Avenue, Baltimore, Maryland 21215-2299
Mitra Gavgani, Board President, Doena Speights-Napata, Executive Director

COMMUNITY PHARMACY INSPECTION FORM:

Maryland Pharmacy Permit Number	1	P05477		
Corporate Pharmacy Name		CVS PHARMACY # 4079		
Pharmacy Name-Doing Business as (d/b/a) or Trade Name	7			
Street Address	1	5603 BALTIMORE NATIO	NAL PIKE , BALTIMORE, MD,	21228
Business Telephone Number	4	410-744-1422		
Business Fax Number		410-719-6183		
Inspection Date		10/25/2017		
Arrival Time		12:30		
Departure Time	4	15:04:43		
		Annual		
Type of Inspection		11/17/2016		
Previous Date		Amando Barefield		
Name of Inspector	3	Amanos Barefield		
I. GENERAL INFORMATION				
● Yes ○ No The pharmacy hours of operation are promine	ently displayed	I if the prescription area is	not open the same hours as	the establishment.
Pharmacy Hours				
Monday: 7am - 10pm Tuesday: 7am - 10pm	We	ednesday: 7am - 10pm	Thursday: 7a	m - 10pm
Friday: 7am - 10pm Saturday: 9am - 9pm	Sui	nday: 9am - 9pm		
	sted conspicuo	ously. HO § 12-311, IIO §	12-408(b) and HO § 12-6B	-08
·	P05477		Expiration Date	05/31/2018
,	474975		Expiration Date	02/29/2020
	AR5275210		Expiration Date	12/31/2019
211 1108:011011011	-		•	
O Yes No The pharmacy performs sterile compounding (I				
O Yes No The pharmacy provides services to Comprehense 10,34.23			nties, (If yes, complete Com	prenensive inspection rottily COMAK
O Yes No The pharmacy fills original prescriptions received	ed via the inter	met,		
	rescribing.			
O Yes No The pharmacist fills mail order prescriptions.				
If yes to any of the above, how does the pharmacist verify that a $10.19.03.02$ and $.07$	relationship ex	kists between the patient a	nd the prescriber? 21 C.F.R.	. § 1306.04, HG § 21-220; COMAR
E-Scripts: Securo Site / Patient Profile F	K History /	Physician can be con	tacted if questionable	
Comments:				7
				=
2. PERSONNEL				
Name of Pharmacist/Manager who is charged with ensuring com-	phance with al	Il applicable laws		
21596: CHRISTOPHER AVON 2	4391: Matthew	Allan Wallace		
Pharmacist Employee License # Status Exp. Date Vaccine C	ertification #S	Status Exp. Date		
CHRISTOPHER AVON 21596 Active 12/31/2018 21596		Active 12/31/2018		
Matthew Allan Wallace 24391 Active 04/30/2018 24391		Active 04/30/2018		
Kelly Christina Moore 24381 Active 06/30/2018 24381		Active 06/30/2018		
Ayodeji Akinwande 23920 Active 03/31/2019 23920		Active 03/31/2019		
	Date			
Tyshall Burton T19924 Active 10/3 Kristin Sade Gillard T19585 Active 10/3				
PETISON SAUG CHIEFE TO/S	112010			

Active 08/31/2018 Active 10/31/2017

DEYVONNE WILLIAM OAKLEYITI 8500

T17747

Isha Harish Nagar

Atabong Forwang	117709	Active	12/31/2017
Ebitimuere Ogobri	T16517	Active	04/30/2019
SO YEON PARK	PI00176	Active	03/31/2019
Mihret Debele	T18917	Active	02/28/2018
Tessa Autumn Fury-Czepik	T19092	Active	09/30/2018
Josanne Traup	T19989	Active	04/30/2019
Eicsha LaToya McMorris	T19195	Active	10/31/2018
Sehar Nadeem	T18381	Active	12/31/2017
TAKITA R BARNES	T07700	Inactive	07/31/2017

Unlicensed Personnel (non-registered)	Title	Duties	
Morgan Roberts (not on-duty)	Tech-training	Technician	
Deyana Neil	Tech-training	Technician	

Please be sure that all licensed are posted, signed and current /Flease send copy of on-duty pharmacist Kelly Mobile CPR certification to Amanda Barefield & 410-384-4137 by 11/01/2017.

(Christopher Avon (CPR 04/27/2019)

Technician Takita Barnes was present working in the pharmacy area performing duties such as counting medications, Communis printing medication lab 12, pulling medication and labeling sedications.

3 PERSONNEL TRAINING

- ■Yes ONo ON/A There are written policies and procedures to specify duties that may be performed by unlicensed personnel under the supervision of a licensed pharmacist. COMAR 10.34.21.03 and 10.34.21.05

- Yes ONo ON/A Biohazard precautions
- Yes ONo ON/A Patient safety and medication errors COMAR 10.34.26.03

Comments:

O Yes
No
The pharmacy wholesale distributes to another pharmacy (COMAR 10.34.37)

O Yes
No
The pharmacy wholesale distributes to a wholesale distributor (COMAR 10.34.37)

O Yes
O No
N/A
The wholesale distribution business exceeds 5% of the pharmacy annual sales (COMAR 10.34.37)

The wholesale distribution as per pharmacy manager Christopher Avon.

Comments:

4. SECURITY COMAR 10.34,05

● Yes O No The pharmacy is designed to prevent unauthorized entry when the prescription area is closed during any period that the rest of the establishment is open. (If yes, briefly describe how access is restricted.) COMAR 10.34.05.02A (5)

Metal Gates / Locked Door when pharmacy area is closed and store is open.
Locked Window / Drawer for Drive-thru

Comments:

The pharmacy and/or pharmacy department has a security system COMAR 10.34.05.02A (2)

 The pharmacy and/or pharmacy department has a security system.

 COMAR 10.34.05.02A (2)

● Yes ONo The permit holder shall prevent an individual from being in the prescription area unless a pharmacist is immediately available on the premises to provide pharmacy services. COMAR 10,34,05.02A (3)

Comments:

5 PHYSICAL REQUIREMENTS AND EQUIPMENT

● Yes ○ No Pharmacy area is clean and orderly. HO § 12-403(b) (11) (ii)2

● Yes ○ No The pharmacy provides a compounding service (non-sterile procedures).

Yes O No
 The pharmacy has a Class A prescription balance and weights, or a prescription balance with equivalent or superior sensitivity.

P Yes O No COMAR 10.34,07.01A

The medication refrigerator(s) have a thermometer and the current temperature is between (36-46F) USP_COMAR 10.34.07.01B

● Yes ○ No						
Temperature		37F, 38,4F, 36F, 42F				
● Yes O No		The current temperature of the pharmacy department is between 59 to 86 degrees F, COMAR 10.34.05.02A (1)(a)				
Temperature • Yes O No O N/A		If the pharmacy stocks medications requiring freezing, the freezer is maintained at temperatures required by the medications stored within it.				
		The pharmacy maintains at all times a current reference library that is appropriate to meet the needs of the practice specialty that pharmacy and the consumers the pharmacy serves. HO § 12-403(b)(10)				
		The pharmacy has online resources. HO § 12-403(b)(15)				
Comments:	nes stored in fric	dqo /Zostavax stored in freezer				
6 DDESCRIPTION	N LABELING, FILES	AND STOPAGE				
● Yes ○ No		for each prescription prepared or dispensed are made and kept on file for at least 5 years. HO § 12-403(b)(13)(i)				
	-	t if a drug is dispensed pursuant to a prescription: HO § 12-505				
The following two		The name and address of the pharmacy; HG § 21-221(a)(1)				
	⊚ Yes O No	The serial number of the prescription; HG § 21-221(a)(2)				
	⊕ Yes O No	The date the prescription was filled; HO § 12-505(b)(1) and HG §21-221(a)(3)				
	⊚Yes ONo	The name of the prescriber; HG § 21-221(a)(4)				
	Yes ONo	The name of the patient; IIG § 21-221(a)(5)(i)				
	• Yes ONo	The name and strength of the drug or devices; HO § 12-505(c)				
	⊚ Yes ONo	The directions for use; HO § 12-505(b)(2)(ii) and HG §21-221(a)(5)(ii)				
	● Yes ○ No	The required cautionary statements or auxiliary labels; HG § 21-221(a)(5)(iii)				
	● Ycs ○ No	The name of generic manufacturer; and HO §§ 12-504(d)(2) and 12-505(c)(2)				
		The expiration date is indicated; HO § 12-505(b)(2)				
Yes ○ No	The pharmacist a	nd data-entry technician initials are on prescriptions. COMAR 10,34,08.01				
	Original prescrip	tions are dispensed within 120 days after the issue date. HO § 12-503				
Phage	ecist and technic	ians initials are located on label,				
Comments:						
7. QUALITY ASS		CSAFETY / MEDICATION ERRORS policies that inform patients of the procedure to follow when reporting a suspected medication error to the permit holder,				
		h care facility, or other health care povider. COMAR 10.34 26.02				
	provided to each	aintains a minimum of <u>two (2)</u> continuous years <u>of records</u> clearly demonstrating the content of annual educational training member of the pharmacy staff involved in the medication delivery system regarding the roles and responsibilities of pharmacy g medication errors. COMAR 10.34.26.03B				
● Yes ○ No	•	ing quality assurance program that documents the competency and accuracy of all assigned tasks, COMAR 10.34,21,03E				
Repor	ting medication e	rror sign is posted at drop-of! window / Training is done through CE credits and Learnnt.				
Comments:						
8: CONFIDENTIA	LITY					
		maintained in the creation, storage, access disposal and disclosure of patient records. FIO § 12-403(b)(13), COMAR				
Yes ○NoYes ○No	Any identifiable	HIPAA Regulations information contained in a patient's record is not disclosed unless authorized by the patient, or an order of the court, or as				
		ant to HG \$4-301 through \$4-307, COMAR 10.34,10.03B				
WIT B	irwa trash is sop	arated into blue bags, HIPAA containers into green bags them sont out for proper disposal.				
Comments;						
9. INVENTORY C	CONTROL PROCEDI	JRES				

O Yes O No ® N/A The pharmacy maintains records of wholesale distribution to other pharmacies separately from its other records, COMAR 10,34,37.03

The pharmacy maintains records of wholesale distribution to wholesale distributors separately from its records of wholesale distribution to other

	olosale Distribution as per pharmacy manager Christopher Avon,					
omments:						
. CONTROLLE	D SUBSTANCES					
	21596: CHRISTOPHEK AVON 24391: Matthew Allan Wallace					
wer of Attorney	The pharmacy has a record of the most recent required biennial inventory of Schedule II - V controlled substances. COMAR 10.19,03.05B					
Yes ONo	Inventory Date: 05:01/2017 Biennial Inventory completed at Opening © Closing					
Yes ONo	The inventories and records of Schedule II-V drugs are maintained and readily available. COMAR 10,19.03.05 and 21 CFR 1304,03					
Yes O No	Records are kept of all receipts of controlled substances entered into the pharmacy inventory (including DEA Form 222 or CSOS orders). COMA 10.19.03.05					
Yes ONo	There are written policies and records for return of Cl1, Cl11-V.					
Yes O'No	Hard copy or electronic prescription files are maintained chronologically for 5 years					
Yes ONo	Schedule II controlled substances are dispersed throughout the stock of non-controlled substances or stored in such a manner as to obstruct theft diversion, COMAR 10.19.03,12B (2)					
Yes ONo	All controlled substances prescriptions bear the name and address of the prescriber and patient. COMAR 10.19.03.07D (1)					
Yes ONo	The permit holder or pharmacist designee(s) has written policies and procedures for investigating discrepancies and reporting of theft or loss COMAR 10.19.03.12B (4)					
Phazi	mecy uses Capitol Returns for reverse distributor					
mments:						
. AUTOMATE	D MEDICATION SYSTEMS O Yes O No (if No, go to #12)					
Yes ONo 📵	N/A The facility uses an automated device(s) as defined in COMAR 10 34.28.02.					
licies and proce	dures exist for (check all that apply): COMAR 10,34,28,04A					
	○ Yes ○ No N/A Operation of the system					
	O Yes O No N/A Training of personnel using the system					
	○ Yes ○ No ● N/A Operations during system downtime					
	○ Yes ○ No No N/A Operations during system downtime					
)Yes ○No ⑨	 ○ Yes ○ No ② N/A Operations during system downtime ○ Yes ○ No ③ N/A Control of access to the device ○ Yes ○ No ③ N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 					
	O Yes O No ® N/A Operations during system downtime O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe quards, COMAR					
/A	 ○ Yes ○ No ② N/A Operations during system downtime ○ Yes ○ No ③ N/A Control of access to the device ○ Yes ○ No ③ N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 					
/A	 Yes ○ No ② N/A Operations during system downtime Yes ○ No ③ N/A Control of access to the device Yes ○ No ③ N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 					
/A	O Yes O No ® N/A Operations during system downtime O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11					
/A	O Yes O No ® N/A Operations during system downtime O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ® N/A Maintenance records					
/A	O Yes O No ® N/A Operations during system downtime O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ® N/A Maintenance records. O Yes O No ® N/A System failure reports.					
/A	O Yes O No ● N/A Operations during system downtime O Yes O No ● N/A Control of access to the device O Yes O No ● N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ● N/A Maintenance records O Yes O No ● N/A System failure reports O Yes O No ● N/A Accuracy audits.					
/A	O Yes O No ● N/A Operations during system downtime O Yes O No ● N/A Control of access to the device O Yes O No ● N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards. COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ● N/A Maintenance records O Yes O No ● N/A System failure reports O Yes O No ● N/A Accuracy audits. O Yes O No ● N/A Quality Assurance Reports.					
dequate records	O Yes O No ● N/A Operations during system downtime O Yes O No ● N/A Control of access to the device O Yes O No ● N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ● N/A Maintenance records. O Yes O No ● N/A System failure reports. O Yes O No ● N/A Accuracy audits. O Yes O No ● N/A Quality Assurance Reports. O Yes O No ● N/A Reports on system access and changes in access. O Yes O No ● N/A Training records.					
dequate records	O Yes O No ® N/A Operations during system downtime O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ® N/A Maintenance records. O Yes O No ® N/A System failure reports. O Yes O No ® N/A Accuracy audits. O Yes O No ® N/A Quality Assurance Reports. O Yes O No ® N/A Reports on system access and changes in access. O Yes O No ® N/A Training records. Devices installed after September 1, 2003 operate in a manner to limit simultaneous access to multiple strengths, dosage forms, or drug entities, and minimize the potential for misidentification of medications, dosages, and dosage forms accessed from the automated medication system. COMAR 10.34.28.04B The absence has records, documents, or other evidence of a quality assurance program reparding the automated medication system in accordance of a quality assurance program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program reparding the automated medication system in accordance of the program acc					
dequate records Yes O No Yes O No Yes O No	O Yes O No ® N/A Operations during system downtime O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ® N/A Maintenance records. O Yes O No ® N/A System failure reports. O Yes O No ® N/A Accuracy audits. O Yes O No ® N/A Quality Assurance Reports. O Yes O No ® N/A Reports on system access and changes in access. O Yes O No ® N/A Training records. Devices installed after September 1, 2003 operate in a manner to limit simultaneous access to multiple strengths, dosage forms, or drug entities, N/A and minimize the potential for misidentification of medications, dosages, and dosage forms accessed from the automated medication system in accorda. The pharmacy has records, documents, or other evidence of a quality assurance program regarding the automated medication system in accorda.					
OYes ONo OYes ONo OYes ONo	O Yes O No ● N/A Control of access to the device O Yes O No ● N/A Accounting for medication added and removed from the system. N/A Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 The maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ● N/A Maintenance records. O Yes O No ● N/A System failure reports. O Yes O No ● N/A Accuracy audits. O Yes O No ● N/A Accuracy audits. O Yes O No ● N/A Reports on system access and changes in access. O Yes O No ● N/A Training records. Devices installed after September 1, 2003 operate in a manner to limit simultaneous access to multiple strengths, dosage forms, or drug entities, n/A and minimize the potential for misidentification of medications, dosages, and dosage forms accessed from the automated medication system in accorda with the requirements of COMAR 10.34.28					
OYes ONo Oyes O	O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ® N/A Maintenance records. O Yes O No ® N/A System failure reports. O Yes O No ® N/A Accuracy audits. O Yes O No ® N/A Quality Assurance Reports. O Yes O No ® N/A Reports on system access and changes in access. O Yes O No ® N/A Training records. Devices installed after September 1, 2003 operate in a manner to limit simultaneous access to multiple strengths, dosage forms, or drug entities, N/A and minimize the potential for misidentification of medications, dosages, and dosage forms accessed from the automated medication system. COMAR 10.34.28.04B The pharmacy has records, documents, or other evidence of a quality assurance program regarding the automated medication system in accorda with the requirements of COMAR 10.34.28					
DYes ONo @	O Yes O No O N/A Control of access to the device O Yes O No O N/A Control of access to the device O Yes O No O N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 The maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No O N/A Maintenance records. O Yes O No O N/A System failure reports. O Yes O No O N/A Accuracy audits. O Yes O No O N/A Quality Assurance Reports. O Yes O No O N/A Reports on system access and changes in access. O Yes O No O N/A Training records. Devices installed after September 1, 2003 operate in a manner to limit simultaneous access to multiple strengths, dosage forms, or drug entities, N/A and minimize the potential for misidentification of medications, dosages, and dosage forms accessed from the automated medication system. COMAR 10.34.28.04B The pharmacy has records, documents, or other evidence of a quality assurance program regarding the automated medication system in accordar with the requirements of COMAR 10.34.28 N/A O Yes O No (if No, go to #13)					
O Yes O No O Yes O No O Mo at omments: 2 OUTSOURCE O Yes O No O Yes O No	O Yes O No ® N/A Control of access to the device O Yes O No ® N/A Accounting for medication added and removed from the system. Sufficient safeguards are in place to ensure accurate replenishment of the automated medication system. If yes, describe safe guards, COMAR 10.34.28.06 are maintained for at least two years addressing the following (check all that apply). COMAR 10.34.28.11 O Yes O No ® N/A Maintenance records. O Yes O No ® N/A System failure reports. O Yes O No ® N/A Accuracy audits. O Yes O No ® N/A Quality Assurance Reports. O Yes O No ® N/A Reports on system access and changes in access. O Yes O No ® N/A Training records. Devices installed after September 1, 2003 operate in a manner to limit simultaneous access to multiple strengths, dosage forms, or drug entities, N/A and minimize the potential for misidentification of medications, dosages, and dosage forms accessed from the automated medication system. COMAR 10.34.28.04B The pharmacy has records, documents, or other evidence of a quality assurance program regarding the automated medication system in accorda with the requirements of COMAR 10.34.28					

O Yes	O No ® N	
OYes	O No ⊚ N	The permit holder employs an outside agency/business entity for the provision of any pharmacy services, inclusive of staffing, remote order entry, and management. If yes: Name of agency, state of incorporation, service contracted, and State of Maryland License/Permit Number: COMAR 10.34.04.06E
	No out	sourcing as per pharmacy manager Christopher Avon.
Comme	nts:	
O Yes	O No N	A The permit holder has written policies and procedures to specify the duties that may be performed by outside personnel, COMAR 10,34.21.03B(3)
If the ph	armacy out	sources a prescription order:
O Yes	O No ⊚ N	A The original prescription order is filed as a prescription order at the primary pharmacy COMAR 10 34.04 06D
O Yes	ONo 🖲 N	A Written policies exist for maintenance of documentation regarding transfer of prescription records COMAR 10.34.04.06
O Yes	ONo ® N	A Documentation is maintained, including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations made. COMAR 10.34.04.03 and .05
The phar	rmacist from	the primary pharmacy documents the following in a readily retrievable and identifiable manner: COMAR 10.34,04.06 (Check all that apply)
		A That the prescription order was prepared by a secondary pharmacy.
O Yes	ONo ® N	'A The name of the secondary pharmacy
O Yes	ONo ⊚ N	A The name of the pharmacist who transmitted the prescription order to the secondary pharmacy.
O Yes	ONo ® N	The name of the pharmacist at the secondary pharmacy to whom the prescription order was transmitted if the transmission occurred in an oral manner.
O Yes	ONo @N	A The date on which the prescription order was transmitted to the secondary pharmacy.
O Yes	ONo ⊕N	A The date on which the medication was sent to the primary pharmacy
O Yes	ONo • N	A The primary and secondary pharmacies are both licensed in the State of Maryland, or operated by the federal government, COMAR 10.34.04.06F The primary pharmacy maintains, in a readily retrievable and identifiable manner, a record of preparations received from the secondary pharmacy COMAR 10.34.04.06G
O Yes	UNO ® N	COMAR 10.34 04.06G
that app	ly)	the secondary pharmacy maintains documentation in a readily retrievable and identifiable manner, which includes: COMAR 10,34,04.07 (Check all
		A That the prescription order was transmitted from another pharmacy
		A The name and information identifying the specific location of the primary pharmacy.
		A The name of the pharmacist who transmitted the prescription to the secondary pharmacy if the transmission occurred in an oral manner
		A The name of the pharmacist at the secondary pharmacy who accepted the transmitted prescription order.
O Yes	ONo ® N	A The name of the pharmacist at the secondary pharmacy who prepared the prescription order.
O Yes	O No	A The date on which the prescription order was received at the secondary pharmacy.
O Yes	ONo ⊚N	A The date on which the prepared product was sent to the primary pharmacy if it was sent back to the primary pharmacy.
13. Reco	ommended :	Best Practices
Yes	O No	A perpetual inventory is maintained for Schedule II controlled substances.
Yes	O No	There are documented contingency plans for continuing operations in an emergency and for disaster recovery of required records,
Yes	O No	The pharmacy has written policies and procedures for the safe handling of drug recalls. See www.recalls.gov
Yes	O No	The pharmacy maintains records of all recalls. See www.igcalle.gov
	OLG ET	CONTROLLED DANGEROUS SUBSTANCES WORKSHEET
Pharmac Permit# Date:		017

	CVS PHARMACY # 4079 P05477 10/25/2017	CONTROLLED DANGEROU	IS SUBSTANCES WORKSHEET		
Rx#: Date Filled:	N1602473				
DRUG		NDC Number	ON HAND INVENTORY	PERPETUAL INVENTORY	
Amphetami	Ine Salts. 30mg tab	00378-4547-01	21	21	Clear
Vyvanse 60	Dmg cap	59417-0106-10	436	436	Clear
Oxycodone	10mg tab	68382-0794-01			Clear

		1			Mer	1
				78	24	
Methylphenidate ER 36mg lab		00591-2717-01	00501 2747 01		130	Clear
oaryiprionio	ate cit doing the	3331271141		1,20	1 50	
omments:	Pharmacy maintains a 10mg over by 4 table	n electronic perpetual inv ts, recommend pharmacy rec	ventory /Minor Discre concile perpetual in	epancy found during name	rcotic audit on Oxyo	codone
		SCHEDUL	E II AUDIT			
		Drug:	N/A			
		NDC Number:				
		Date of last Inspection/Biennia	ıl: 11/17/2016			
mount at l	ast inspection/blennial	0.00	(A)			
urchased s	ince inspection/biennial	0.00	(B)			
otal invent	•	0	(C) = A + B			
uantity Di	-	0.00	(D)		Į.	
expected In	•	lo	(E) = C - D			
Quantity on	•	0.00	(F)			
Discrepancy		0.00	(G) = (F-E)excess or	(E-F) shortage		
pane)		F	(0) (1 2)6.000.00	()		
ш ^{А11 in} v:	voices reviewed were	e signed and dated.				
		PR	ESCRIPTION REVIEW	,		
II#:	N1593854 -1583001					
ate:	10/04/2017 -09/06/2017					
		address on script doesnt label /All prescriptions				on
Ш- V#:	C1598961-1598391					
ate: [10/17/2017 -10/16/2017					
		address on script doesnt label /Prescriptions revi				on
	Browse					
THEODIN	HAME OR OF EARING AGE, DISCUSS ENDITES WITH AID OR REHE	■ *CVS pharm	acy'	CLHOT DRINK ALCOHOLIC BEVE WER USING THIS MEDICATION	WHORS	
VEHICLE	USE DROWSINESS AND SS. CAREFUL USING VESSEL MACHINES ARORE ACUT AMINOPHEN ECCHAMPINDED CAN CAUSE	OXYCODONE- ACETAMINOPH		ISING MORE THAN RECOMMENT AUSE BREATHING PROBLEMS	DETS MAY	
SEMONE SPH SeO Only: 10 Date f Discar	VENUE PROBLEMS. VENUE lede lichay VENUE 10/25/2017 Filled: 10/25/2017 Fd After: 10/25/2018 WHITE WOUND shaped	TAKE I TABLET E	Yange			

Pharmacist Signature for Controlled Dangerous Substances Audit:	Wan
such as counting medications, printing medication labels,	rication. All policies and procedures are located online. All policies and procedures are located online. All policies area. Minor Discrepancy found during and pharmacy reconcile perpetual inventory. No expired as was present working in the pharmacy area performing duties pulling medications and labeling medications. are posted, signed and current. 2) Please send copy of on-
Inspector Signature: Pharmacist Name (Print): 21596 21596 21596: CHRISTOPHER AVON	Date: 10/25/201
Signature: Cho h	
Received a copy of this inspection	~

410-764-4755 - Fax 410-384-4137 - Toll Free 800-542-4964 MDH 1-877-463-3464 - Maryland Relay Service 1-800-735-2258 Web site: https://health.maryland.gov/pharmacy/Pages/index_aspx